REMARKS

The non-final Office Action mailed August 10, 2006, has been carefully reviewed, and these remarks and amendments are responsive thereto. Reconsideration and allowance are respectfully requested. Claims 41-43 and 46-50 are now pending. No new matter has been added.

The Rejections

Of the pending claims, claims 41-43 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,128,014 to Nakagawa et al. ("Nakagawa") in view of U.S. Patent No. 6,157,381 to Bates et al. ("Bates"), and further in view of U.S. Patent No. 4,495,490 to Hopper ("Hopper"). Applicants respectfully traverse all rejections in view of the amendments and remarks herein.

Independent Claim 41

Claim 41 recites determining a first un-rounded location in a document based on a first location of a pointer; rounding the first un-rounded location in the document to a nearest first text line; moving the document to the first text line; and determining a second un-rounded location in a document based on both a second location of the pointer and the first un-rounded location in the document.

Nakagawa discloses calculating an amount to move an image based on the difference between a pen's current position (xnow, ynow) and the pen's previous position (xprev, yprev), multiplied by a coefficient. Nakagawa, col. 7, lines 24-34. When a subsequent pen position is received, the values of (xprev, yprev) are replaced with the values of (xnow, ynow), and new (xnow, ynow) values are determined based on the subsequent pen position. Nakagawa, col. 7, lines 38-42. This process is also shown in Fig. 6 as steps 34-36. Thus, Nakagawa discloses that xnow,ynow = xnow,ynow − xprev,yprev. As the Office Action acknowledges, neither xprev, yprev, xnow, nor ynow are rounded to a nearest text line.

The Office Action therefore relies on Bates and Hopper for disclosing rounding to the nearest text line. Even if this were true, the proposed combination still would not have all of the claimed features. In particular, claim 41 specifically requires that the second un-rounded location in a document based on the first *un-rounded* location in the document. In contrast, the

Office Action proposes to modify Nakagawa in a way that would, at best, determine any subsequent locations based on previous *rounded* locations, i.e., xnow,ynow = xnow(rounded),ynow(rounded) – xprev(rounded),yprev(rounded).

On the other hand, by moving the document to rounded locations *but determining subsequent locations based on previous un-rounded locations*, subtle changes in the user's inputs may be allowed to add up over time, which may eventually affect the actual scrolling position. Specification, p. 21, paragraph 49. Referring to an illustrative embodiment in Applicants' specification consistent with claim 41, both a fine (un-rounded) virtual scrolling position and a coarse (rounded) actual scrolling position may be maintained. Specification, p. 18, paragraph 44. Each time the document is scrolled, the actual scrolling position may be calculated based on the un-rounded virtual scrolling position. Specification, Fig. 3; pp. 20-21, paragraph 49.

As for the proposed combination of references, there is nothing to teach or suggest rounding a document position yet continuing to use the *un-rounded* version of the document position to determine a subsequent document position. At best, the proposed combination would determine new positions only from previous rounded positions.

For at least this reason, it is submitted that Nakagawa, Bates, and Hopper, either alone or in combination as proposed, fail to teach or suggest every feature recited in claim 41.

Independent Claim 46

New claim 46 recites determining a first location in a document based on a first location of a pointer, the first location in the document being of a first numerical resolution; determining a second location in the document based on the first location in the document, the second location in the document being of a second numerical resolution lower than the first numerical resolution; moving the document to the second location in the document; and determining a third location in the document based on both the second location of the pointer and the first location in the document.

Thus, it is submitted that claim 46 is allowable for at least similar reasons as claim 41.

Independent Claim 49

New claim 49 recites determining a first location in a document based on a first location of a pointer, the first location in the document being defined in a first unit of measurement; determining a second location in the document based on the first location in the document, the

second location in the document being defined in a second unit of measurement different from the first unit of measurement; moving the document to the second location in the document; and determining a third location in the document based on both a second location of the pointer and the first location in the document.

Thus, it is submitted that claim 49 is allowable for at least similar reasons as claim 41.

Dependent Claims

The remaining dependent claims are also allowable by virtue of their dependence on allowable independent claims, and further in view of the additional features recited therein.

Conclusion

All rejections having been addressed, allowance and notification of the same are respectfully requested. Should the Examiner have any questions or believe that a telephone call or personal interview would be beneficial, she is invited to contact the undersigned at the number below.

Respectfully submitted,

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